

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAY 24 2006

JAMES R. LARSEN, CLERK
DEPUTY
RICHLAND, WASHINGTON

2nd Amended complaint

Court File

DECLARATION OF PLAINTIFF

CASE No. CV-06-5037 EFS

Sherry E Becker , Plaintiff

v.

DISCOVER FINANCIAL CREDIT CARD
SERVICES, GENESIS FINANCIAL
SOLUTIONS, et al. , Defendants

Plaza Associates /

Mitchell N. Kay

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

CITATIONS OF AUTHORITIES

BILLING ERRORS

- 1.15 U.S.C.1693f(a)(f)(1)(2)(6)
- 2.15 U.S.C 1693g(e)
- 3.15 U.S.C.1666(a)(A)
- 4.15 U.S.C.1666a.(a)

FAIR DEBT COLLECTION PRACTICE ACT

- 1.15 U.S.C.1692e(2)(A)(6)(B)(8)(10)(12)(14)
- 2.15 U.S.C.1692j(a)(b)

FAIR CREDIT REPORTING ACT

1. 15 U.S.C. 1681 et seq.

CASES TO SUPPORT DECLARATION

1. 141 Cal.App.3d 108(March 22, 1983)
YOUNG v. BANK OF AMERICA
Credit Card Act 1747 FRCA case
2. 307 F.3d 623 NIELSON v. DICKERSON
(7th Cir 2002) FDCPA case
3. 232 F.Supp.2d 436 OLSAN v. KAY
(E.D. Pa. 2002) FDCPA case
4. 282 F.3d 1057 NELSON v. CHASE
(9th Cir. 2002)

Appendix
of Attachments

Appendix of attachments for Amended Complaint

1. Plaintiff's billing statement for August 2000 (Discover)
2. Plaintiff's billing statement for August 2000 (MBNA)
3. Copy of cashiers check for \$2000.00 made out to Discover Bank
4. First *certified letter* to Discover September 2000
5. *Second certified letter* to Discover November 2000
6. Copy of return receipt green cards to Discover various dates
7. Copy of letter from Discover's Melanie Cowdery 2/15/2001
8. First collection notice Encore 8/1/01
9. *Certified letter* to ENCORE 08/10/01
10. Second notice of collection NAFS 03/15/02
11. *Certified letter* to NAFS 03/21/02
12. Copy of handwritten letter to NAFS *second response* 03/28/02
13. Third notice of collection American Recovery Service 04/08/03
14. Copy of handwritten letter to ARS 04/13/03
15. Second attempt by ARS to collect by notice 05/08/03 Roseburg
16. Copy of *certified response* to Mr. Roseburg 06/30/03
17. Fourth collection notice from PRM Financial August 2004
18. *Fourth certified* letter to Discover and PRM 08/15/04

19. Copy of Complaint to Washington State ATG August 2004
20. Copy of letter from ATG 09/14/04
21. Copy of PRM's response to ATG 09/09/2004
22. Copy of letter from Discover's Pam Martin 10/12/04

DISCOVER and MITCHELL 2005

23. Copy of first notice from "PLAZA ASSOCIATES" 05/13/05
24. Copy of second notice from "PLAZA ASSOCIATES" 06/27/05
25. Copy of third notice from Law Office of Mitchell N. Kay 08/8/05
26. Copy of fifth certified letter to Discover and Kay 08/16/05
27. Copy of return receipt to Kay 08/22/05 (Discover kept their card)
28. Copy of response from Kay's law office 08/24/05
29. Copy of response from Discover's Pam Martin 09/14/05
30. Attachment from Martin 2004 response 09/14/05
31. Copy of letter from Kay's law office 09/29/05
32. Copy of envelope from Kay's Law office 09/29/05
33. Fourth collection attempt by Kay's law office 10/31/05
34. Copy of back side of collection notice 10/31/05
35. Sixth collection agency notice from Northland Group 04/13/06

Credit reports for Plaintiff Ms. Becker

1. Experion May 7th 2006 Discover only
2. Experion 4/21/06 Discover and Genesis
3. Trans Union 04/21/06 & 03/03/06 Discover
3. Equifax 01/19/06 Discover and Genesis
4. Experion 01/19/06 Discover and Genesis
5. Experion 09/08/05 Discover and Genesis
- 5a. Experion 04/11/05 Discover
6. Trans Union 09/08/2005 Discover and Genesis
7. Equifax 09/06/02 Discover
8. Refusal of Credit letter from CU Lending 10/27/2004
related to Discover's negative listing

III

Sherry E Becker
200802 E Game Farm Rd.
Kennewick Wa. 99337
509-582-2263

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Sherry E. Becker
Plaintiff

v.

DISCOVER FINANCIAL
CREDIT CARD SERVICES,
GENESIS FINANCIAL
SOLUTIONS, et al., Defendants)

) *Amended Complaint and*
) *No. CV-06-5037 EFS*
) *Declaration Specific Cause of Action*
) 15 U.S.C. 1693f(a)(f)(1)(2)(6) 1693g(e)
) 15 U.S.C. 1666(a)(A) 1666a.(a)
) 15 U.S.C. 1692e(2)(A)(6)(B)(8)(10)(12)(14)
) 15 U.S.C. 1692j (a)(b) FDCPA
) 15 U.S.C. 1681s-2(b)

1. This declaration for cause of action comes before the Court in good faith.
2. Plaintiff under the current circumstances is counting on the Court to step in and enforce mandatory Consumer protection statues that have
3. been completely avoided by the named defendants in this declaration .
4. The Court has proper jurisdiction under 15 U.S.C. relating to both FCRA and FDCPA. Plaintiff and main defendant became involved by
5. contract that originated in Benton county at Sears Columbia Center Mall .
6. Count 1. U.S.C. 1693f(a)(1)(2)(3) Error resolution
7. The plaintiff notified the defendant when she noticed the error on the August 2000 billing statement . Plaintiff has sent *numerous notices*.
8. Currently as of this declaration being filed defendants have never acknowledged this billing error and have refused to follow the law in
9. dealing with the plaintiff and complying with their statutory duty.
10. Defendants have no legal right to refuse to correct an error they made.
11. ONE

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

1. Count 2. U.S.C. 15 1693f(f) Acts constituting error
2. (1) Unauthorized electronic funds transfer
3. (2) An incorrect electronic fund transfer from or to consumer's acct.
4. (4) A computational error by the financial institution.
5. (6) Consumer's request for additional information concerning EFT or any documentation required by this title.
- 6.

7. The Plaintiff never authorized the July 29 2000 balance transfer.
8. The defendant's agent PAM MARTIN acknowledged this fact
9. in 2004 in her response to the plaintiff and the ATG of Washington state who had investigated DISCOVER over this issue.

10. In 2005 DISCOVER again attempted to collect the bogus debt .
11. DISCOVER used GENESIS FINANCIAL and KAY'S PLAZA ASSOCIATES to contact the plaintiff Ms. Becker in May 2005.

12. Both defendants responded in writing to plaintiff. KAY sent a notice
13. stating that his office had noted the dispute in their records. KAY
14. stated that they were closing the file and return the account to the creditor GENESIS FINANCIAL/DISCOVER CARD.

15. In September 2005 plaintiff received a reply from PAM
16. MARTIN a DISCOVER executive officer. The defendant's agent
17. was again sent the proof of the error on August 2000 statement .
DISCOVER's agent MARTIN for a second time had a chance to
correct the error and chose not to. This is fatal on DISCOVER's part .

18. MARTIN states in this letter the plaintiff called in August 2000 and
19. said the balance transfer was unauthorized . This letter confirms
the plaintiff's position and releases plaintiff from being held liable.

20. U.S.C. 1693g(e) Releases plaintiff from any liability
TWO

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

1. Count 3 U.S.C. 1666(E) States that :
2. Any creditor who fails to comply with the requirements of this section or U.S.C.1666a. Forfeits any right to collect . [end quote]

3. Based on both letters that defendant sent to plaintiff and the contents of the communication from it's own agent . The Court can see the
4. defendant has not complied with their statutory duties .

5. The defendants have been in open defiance of the entire FDCPA Act.

6. This cause of action rests upon that defiance.

7. Plaintiff asks the Court to grant judgment as a matter of law.

8. Count 4 U.S.C. 1666a. Regulation of credit reports

9. The defendants all reported adversely to all three credit reporting agencies . Both defendants had been sent certified letters refuting
10. the error in regards to this action.

11. DISCOVER in July 2001 began to damage the plaintiff's credit record.

12. Even after plaintiff had sent 3 certified letters to DISCOVER.

13. No agents of the defendant DISCOVER ever acknowledged in writing the dispute. The first certified letter was sent in September 2000.

14. Plaintiff sent with the certified letter the cashiers check for \$2000.00.

15. The return receipts have been filed with the declaration to support the cause of action as factual truth and to get this awful nightmare over.

16.

17. Plaintiff sent other certified letters to the fake names DISCOVER used while attempting to collect the bogus debt .

18.

19. Plaintiff each time sent the offer of proof to dispute the debt .

20.

THREE

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

1. Count 4.(continued) The defendants had knowledge that the debt
2. was disputed and when they made the adverse report to the credit
3. agencies DISCOVER never reported the debt as disputed .
4. The defendants are thus liable under 1693f(e) Treble damages as it
5. can be determined from the evidence and defendant's own responses
6. that they were refusing to comply with their duty .
7. The first response to this issue did not occur until after 4 1/2 years
8. of the defendant repeatedly hounding plaintiff and plaintiff decided to
9. turn them in to the Washington State Attorney General's Consumer
10. Protection Division.
11. DISCOVER's PAM MARTIN in her reply to ATG's office had no
12. solid evidence to show the ATG or plaintiff what she had done
13. to investigate.
14. MARTIN's letter amounts to nothing more then *verbal* posturing .
15. This plaintiff has factual documentation to back up this declaration.
16. The key piece of evidence is the MBNA August 2000 statement.
17. This document overcomes any kind of argument DISCOVER has.
18. Defendant has continued this act of fraud which is what
19. has taken place for 6 1/2 years now.
20. The plaintiff trusts the Court to rule based on the statutory duty the
- defendant was obligated to comply with yet intentionally failed to do so.
- Judgment as a matter of law is requested by plaintiff.

FOUR

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

- Count 5.* U.S.C. 1692 et seq.
1. DISCOVER/GENESIS FINANCIAL, MITCHELL N. KAY
 2. These defendants by their actions in refusing to follow 1692et seq.
 3. have caused serious damage to the plaintiff Ms. Becker. Plaintiff tried to refinance her home and was turned down because of DISCOVER.
 4. Under the Fair Debt Collection Practice Act the facts are that the defendants did not comply *as required* within the statutory time
 5. limit and defendant's *own* guidelines printed on reverse side of bill .
 6. All defendants under 1692a (6) qualify as "debt collector".
 7. DISCOVER has always maintained absolute control over the bogus debt collection activities in regards to plaintiff Ms. Becker.
 - 8.
 9. Under many different names DISCOVER pursued the plaintiff.
 10. The plaintiff ironically "discovered" this by realizing that each collection attempt from a new "assignee" always had the term "FINANCIAL" in part of it's name.
 - 11.
 12. The defendant KAY gave this away when his office sent the September 29th 2005 notice which was signed by a DEBORAH
 13. BOLDEN.
 14. The creditor at the top is listed as Genesis Financial Discover Card there *is no* assignee because it was *always* DISCOVER .
 15. This is false and misleading per 1692e(6)(B).
 16. 1692(8)(10)(12)(14) were all employed by DISCOVER routinely and for 6 1/2 years against plaintiff .
 17. 1692e(12) At least 6 different times DISCOVER pretended to be a new assignee .
 - 18.
 19. Finally 1692e(2)(A) there is no getting around defendant made a false representation of (A) against plaintiff for *6 years*.
 - 20.

FIVE

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

1. Count 6 U.S.C. 1692j.(a)(b)Furnishing deceptive forms
2. FDCPA
3. Defendant MITCHELL N. KAY and his law office otherwise known
4. as "PLAZA ASSOCIATES" began in May of 2005 sending debt
5. notices to the plaintiff Ms. Becker.
6. Only 6 months had passed since DISCOVER used PRM in 2004 to
7. harass Ms. Becker and now they were using defendant KAY's
8. agency "PLAZA ASSOCIATES". Plaintiff thought "here we go again".
9. Plaintiff admits she did not respond to the first two notices.
10. The May and June 2005 notices were disregarded as plaintiff had grown
11. tired of DISCOVER's "Tirade of Madness" in pursuing her and ruining
12. her life through non-stop notices without out any basis in law for doing
13. so.
14. Fair Debt Collection Practices Act violations.
15. Both defendants under 1692j.(a)(b) have used various notices and sent
16. them to the plaintiff . Both defendants knew or should have known
17. that this was highly illegal . Defendant KAY had done this at
18. least one other time back in 2001.
19. In 2002 KAY's law office had a class action filed against them.
20. See 232 F. Supp.2nd 436 (2002) OSLAN v. LAW OFFICES OF
21. MITCHELL N. KAY
22. Defendant was sued for the exact same issues in front of this Court here.
23. KAY settled out of court . For violating FDCPA et seq.
24. Defendant KAY made the same "settlement offer" to Ms. Becker.
25. The notices both defendants sent state that they are from a debt
26. collector. All notices sent were used to create a false belief that some
27. one other then the defendants in this case were pursuing collection.
- 28.
- 29.
- 30.

SIX

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

1. Count 6. cont. Defendant KAY sent a total of 6 notices.
2. from May through October 2005. Then defendant KAY in
3. April 2006 submitted the debt to a collection agency called the
4. NORTHLAND GROUP.
- 5.
6. It was at this point that plaintiff realized legal action was going to be
7. the only way to stop DISCOVER and KAY from damaging her
8. credit and causing further harm and stress .
- 9.
10. DISCOVER has violated 1692j.(a)(b)FDCPA in this case 7 times.
- 11.
12. KAY sent the August 8th 2005 notice and it stated :
- 13.
14. If you notify this office in writing that the debt is disputed this office
15. will obtain verification of the debt or obtain a copy of the judgment
16. and mail you a copy of such judgment or verification .
- 17.
18. Plaintiff sent certified notice with the factual evidence . Defendant
19. acknowledged the dispute and then sent the September 29th 2005
20. letter on MICHELL N. KAY's official letter head . KAY states that :
- 21.
22. "Our client has advised us that the claim of dispute for the above
23. referenced account is not valid and the balance is due and owing.
24. See the enclosed letter dated 09/14/05. Disregard our 08/24/05
25. letter . We are still handling this matter."
- 26.
27. There was no verification that proved the debt was due and owing
28. from either defendant DISCOVER/GENESIS or KAY .
- 29.
30. At no time in 6 1/2 years has DISCOVER ever been able to factually
31. prove that plaintiff Ms. Becker legally owed them anything .
- 32.
33. Which is *why DISCOVER could never legally assign the bogus debt*
34. *to anyone but themselves as they knew it was fraudulent .*
- 35.

SEVEN

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

Count 7 15 U.S.C.1681s-2(2)(3)

- 1
2. Both DISCOVER/GENESIS ,KAY have violated their duty under
3. FCRA by refusing to report accurate information regarding plaintiff's
4. dispute over the issue.
5. DISCOVER has for 6 1/2 years never acknowledged the disputed
6. error. This is a direct duty under the Fair Credit Reporting Act .
7. Defendant never updated any information with EXPERION .
8. last date reported states July 2001 .
9. Plaintiff called credit agency EXPERION after receiving the most
10. current date of May 7th 2006 . It states at the bottom verified as of
11. April 2006 . Yet the top part states July 2001 . In this current report
12. that was purportedly verified recently there is again no admission
13. from DISCOVER reporting the dispute from plaintiff.
14. 1682s-2(b) DISCOVER had a duty to update the current information
15. and as always in this plaintiff's case refused to do so.
16. All defendants named failed to report disputed error as required .
17. The statements in this declaration are supported by substantial
18. evidence. The plaintiff again makes a plea for judgment as a matter
19. of law based on the obvious and most recent refusal by DISCOVER/
20. GENESIS, and KAY to comply with their statutory duty and
- make a truthful report to EXPERION and other credit agencies.
- Plaintiff submits this declaration based upon integrity and respect for
- the judiciary
- The plaintiff rests and relies on the Court and Federal law to correct
- the injuries and award appropriate damages to the plaintiff based on
- how long plaintiff had to endure these intentional acts by all parties
- involved in the fraudulent collection attempts .

EIGHT

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

GENERAL PRAYER FOR RELIEF

1.

2.

The plaintiff Ms.Becker having set forth the facts and circumstances requests prayer of relief from the Court .

3.

The acts of the defendants were intentional this warrants awarding punitive and actual damages in treble and further statutory damages .

4.

5.

The amount sought \$ 645,177.00 against DISCOVER is not to be greedy or excessive .

6.

7.

DISCOVER has maintained for over 65 months the bogus debt amount of \$3029.00 was valid . The amount \$3029.00 multiplied by

8.

65 months comes to \$196,885.00 .

9.

DISCOVER used GENESIS FINANCIAL to damage plaintiff's credit from July 2005 to January 2006. Six months they declared plaintiff

10.

owed \$3029.00 dollars. 6 months multiplied by \$3029.00 is \$18,174.00.

11.

The combined amounts $\$196,885.00 + \$18,174.00 = \$215,059.00$.

12.

Due to DISCOVER's intentionally refusing to correct the error treble damages are available in regards to this cause of action .

13.

14.

Plaintiff would like the Court to consider how she tried at all times to resolve this prior to the current action she took .

15.

16.

Plaintiff deserves the award amount requested based on the intentional negligent acts against her by all defendants .

17.

18.

In YOUNG v. BANK OF AMERICA 141 Cal.App.3d 108 (1983)

19.

The court awarded treble the jury award as the acts of defendant were in violation of their statutory duty and intentional .The same issue that is present in this action before the Court .

20.

NINE

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

1. The award amount should include the current interest rate as defendant would ask the same against plaintiff if the debt was enforceable .
- 2.
3. The emotional distress that defendant DISCOVER caused plaintiff should be considered and award any other damages as the Court sees
4. fit .
5. The defendant KAY should not be shown an ounce of leniency.
6. The case OLSAN v. LAW OFFICES OF MITCHELL N. KAY
7. 232 F.Supp.2d 436 shows that he has not learned anything since being sued for the very same matter in 2002 .
8. Based on this case against the defendant the plaintiff would ask the Court to award special damages to plaintiff .
- 9.
10. The award of special damages in the amount of \$ 25,000
11. is based on the fact he chose to re-offend and with knowledge did
12. cause harm by way of reporting to CRA's and subsequently turning the plaintiff over to the NORTHLAND GROUP which caused collection notice to be sent to plaintiff .
13. Since defendant KAY's acts were intentional and he had knowledge it was a violation plaintiff asks the Court to again treble the award
14. amount .
15. Plaintiff would say to all parties that she wishes this could have been avoided and based of Federal law should have been avoided .
- 16.
17. Plaintiff never caused the error and based on defendants admission in two legal letters damages should be awarded accordingly .
- 18.
19. This Prayer for Relief is submitted under substantial Federal Law.
- 20.

TEN

AMENDED COMPLAINT AND SPECIFIC CAUSE OF ACTION

1.

2.

3.

4.

Presented by :

Sherry E Becker
Sherry E Becker
Pro Se

5.

6.

509-582-2263

200802 E Game Farm Rd.

7.

Kennewick Wa. 99337

8.

9.

10.

11.

12.

13.

14.

15.

16.

17.

18.

19.

20.

Direct
Evidence
Attachments

DISCOVER
 PLATINUM

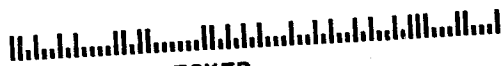
 payment due date
 September 17, 2000

 minimum payment due
 \$0.00

 new balance
 \$4,502.11

 account number
 enter amount enclosed below

\$

 Please make check payable to Discover Platinum Card.
 No payment due! You recently paid more than the
 minimum. Optional payment amount: \$94.00.

 SHERRY E BECKER
 820 S 7TH AVE
 PASCOWA 99301-5722

YES! Enroll me in optional CreditSafe(R) Plus
 credit insurance. I have read and understand the
 disclosure on the reverse side.

Signature: _____ Date: _____

 COURT
 File

 PO BOX 30395
 SALT LAKE CITY UT 84130-3395

Address or telephone change? Please print change in the space above.

91972045021100488340000000

 Cashback
Bonus
 award

Closing Date: August 20, 2000

page 1 of 2

	this period	to date
Cashback Bonus [®] Award	\$0.00	\$0.00
qualified purchases	\$0.00	\$0.00
Cashback Bonus award earned	\$0.00	\$0.00
Cashback Bonus anniversary date: September 20		

Discover Platinum Card Account Summary

account number	1972
payment due date	September 17, 2000
minimum payment due	\$0.00
credit limit	\$6,500
credit available	\$1,997
cash credit limit	\$3,250.00
cash credit available	\$1,997.00

previous balance	\$2,488.34
payments and credits	- 488.34
purchases	+ 0.00
cash advances	+ 0.00
balance transfers	+ 2,488.34
FINANCE CHARGES	+ 13.77
new balance	= \$4,502.11

 You may be able to avoid Periodic Finance Charges, see the
 reverse side for details.

Transactions

	trans. date	post date		
Payments and Credits	Aug 10	Aug 10	PAYMENT - THANK YOU	\$ -488.34
Balance Transfers	Jul 29	Jul 29	3336E0DE	2,488.34
APR 3.90% EXPIRES 01/2001				

 Effective August 1, 2000, Greenwood Trust Company, the bank that issues your Discover Card, will begin operating
 under the name Discover Bank. Please note that this change will have no effect on your account(s).

 Eat out often? Well, Dine Out with Discover(R) Card for a chance to win! During the month of September, your meal
 could be on us when you use your Discover Platinum Card at any of your favorite restaurants that accept Discover Card.
 See the enclosed Explore Newsletter for further details!

Please see following page for additional information. Questions? Call 1-800-DISCOVER(1-800-347-2683)

F119515 PL

7

 Access your statement online at www.discovercard.com

 Use Where
 You See


CARDHOLDER SINCE 1998

17

SHERRY ELIZABETH BECKER
820 S 7TH AVE
PASCO WA 99301-572220

[illegible]

ACCOUNT NUMBER	CREDIT LINE	CASH OR CREDIT AVAILABLE	DAYS IN CYCLE	CLOSING DATE	TOTAL MINIMUM PAYMENT DUE	PAYMENT DUE DATE
4264 2925 8557 3336	\$9,000	\$9,000.00	32	08-21-00	\$.00	09/19/00

POSTING		TRANSACTIONS	AUGUST 2000 STATEMENT		CHARGES	CREDITS (CR)
DATE	DATE	REFERENCE	CARD TYPE	NUMBER		
PAYMENTS AND CREDITS						
0801		825300505090065 VS		PMT FROM BILL PAYER SERVICE		2,488.34 CR
0809		22255108785 VS		PAYMENT - THANK YOU		64.04 CR
0821		7416407023332180483287 VS		SCHUCK'S #48 00000489 PASCO	WA	9.72 CR
PURCHASES AND ADJUSTMENTS						
0726	0725	24692160207000277493058 VS	C	PAD PADDOCK INC	KNIGHTSTOWN IN	* 21.90
		ORDER NO.		0000000000398761		
0818	0815	24399000230903354228450 VS	C	KMART	00003354 KENNEWICK WA	77.99
0819	0817	24270760231130005897283 VS	C	SCHWAN'S HOME SERVICE	507-5323274 MN	19.95
		ORDER NO.		0045307785075323274		
0819	0817	24164070231332173465868 VS	C	CSK DBA AL'S	00043463 KENNEWICK WA	66.95
TOTAL FOR BILLING CYCLE FROM 7/21/2000 THROUGH 8/21/2000						\$186.79 \$2,562.10 CR

CREDIT BALANCE PLEASE DO NOT PAY

FOR UP-TO-DATE ACCOUNT INFORMATION, VISIT WWW.MBNANETACCESS.COM

INVEST IN MBNA PLATINUM PLUS CD AND MONEY MARKET ACCOUNTS. CALL 1-800-414-1270, MON-FRI 8AM TO 8PM & SAT 8-5 (EASTERN TIME). MEMBER FDIC.

STILL LOOKING FOR A SUMMER VACATION SPOT? LET US FIND YOUR PERFECT GETAWAY.
CALL 1-888-899-3682 OR VISIT WWW.MBNATRAVEL.COM FOR GREAT VACATION VALUES!

SUMMARY OF TRANSACTIONS							TOTAL MINIMUM PAYMENT DUE	
Previous Balance	- Payments and Credits	+ Cash Advances	+ Purchases & Adjustments	+ Periodic Rate FINANCE CHARGES	+ Transaction Fee FINANCE CHARGES	= New Balance Total	Past Due Amount	\$0.00
\$64.04	\$2,562.10	\$0.00	\$186.79	\$0.00	\$0.00	\$2,311.27CR	Current Payment	\$0.00
							Total Min Payment Due	\$0.00

FINANCE CHARGE SCHEDULE Category	Periodic Rate	Corresponding Annual Percentage Rate	Balance Subject to Finance Charges
A. BALANCE TRANSFER, CHECKS	.021890% DLY	07.99%	\$0.00
B. ATM, BANK.043808% DLY	15.99%	\$0.00
C. PURCHASES043808% DLY	15.99%	\$0.00
D. OTHER BALANCES.000000% DLY	00.00%	\$0.00

FOR THIS BILLING PERIOD
ANNUAL PERCENTAGE RATE ... SEE ABOVE

THIS DOCUMENT IS A COPY OF YOUR STATEMENT. IT IS FOR YOUR RECORDS ONLY AND IS NOT AN OFFICIAL BANK DOCUMENT. THIS COPY IS NOT AN EXACT DUPLICATE AND MAY NOT INCLUDE MESSAGES WHICH APPEAR IN THE IMPORTANT NEWS BLOCK ON YOUR ORIGINAL PERIODIC STATEMENT.

PAGE 1 OF 1

FOR YOUR SATISFACTION, EVERY HOUR, EVERY DAY

- For our automated Direct Connect service, call 1-800-789-6685
- To speak to one of our Customer Satisfaction representatives, call 1-800-789-6701
- For TDD (Telecommunications Device for the Deaf) assistance, call 1-800-346-3178
- Billing rights are preserved only by written inquiry. Mail billing inquiries and all other account inquiries to:
MBNA AMERICA P.O. BOX 15026
WILMINGTON, DE 19850-5026

PURCHASER'S RECORD
BANK OF THE WESTPARKADE BRANCH
2 EAST KENNEWICK AVENUE
KENNEWICK, WA 98336

2151029502

1029502
90-78/1211

SEP 18, 2000

PURCHASER: ****SHERRY E. BECKER****PAID TO ****DISCOVER BANK****
TWO THOUSAND and 00/100\$ *****2,000.00*****CASHIER'S CHECK****NON-NEGOTIABLE**

2151029502

WARNING: Original document has an artificial watermark on reverse side.

BANK OF THE WESTPARKADE BRANCH
2 EAST KENNEWICK AVENUE
KENNEWICK, WA 98336

RW62A 1-207

*without Recourse*****SHERRY E. BECKER****

2151029502

1029502
90-78/1211

SEP 18, 2000

PURCHASER:

PAY TO THE ****DISCOVER BANK****
ORDER OF **TWO THOUSAND and 00/100**\$ *****2,000.00***acc # ~~0000000000~~ 1972
account paid in full**CASHIER'S CHECK***Lyndu Turner*
AUTHORIZED SIGNATURE

2151029502 # 0121100782 0410000500 91.50

Sept 20, 2000

certified #

7000 0520 0012 2122
9278Discover card / BANK
PO 15192

Wilmington DELAWARE 19886-1020

Dear Sir / madam

~~I am writing to you regarding a fraud on the American public. I need to get some answers to questions before I continue~~

to use my card. Here is the \$2000.00 to pay off the account. As far as I'm concerned there is now no amount owed by myself to Discover. I'm not liable Nor responsible for your agents mis-handling your computer's generated entries in regards to an alleged ^{credit} ~~balance~~ request supposedly by myself which is false in that having worked as a telemarketer I know the legal requirements when it comes to credit cards, Numbers And voice recording's to verify sales. Hence there is no voice recorded request for a ~~balance~~ balance transfer to MBNA.

Shirley Becker

Final Notice

certified

7000 0520 0012 2121 1822

Nov 7th 2000this is the response
letter to

Discover Card Bank

Discover/melanie Caudery

PO 15192

sent notice Feb 15 2001

Wilmington DE 19886-1020

But suit fit

1st in Nov 2000

Dear Sir/Madam

on ^{received by Discover} [Sept 27]

I sent a certified letter asking for information regarding how Discover Card operates and how charges ~~are made~~ ^{and the like are} handled within its system. My questions are still unanswered. I have enclosed a copy of my August 20th statement. Discover must agree that if a balance had indeed been transferred there would not be any balance left on the account. Therefore I should have had a ZERO balance had the transfer occurred. Why does my statement have double the amount? You know I'm not dumb. I sent 2000.00 to discover.

There is no amount owed and as of this notice I consider my account ZERO. I do not want to get any more bills as they will be thrown in the garbage.

PCW 6241-207 w/o prejudice
without recourse

ONE

Shirley Becker

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Discover Bank
PO 15192
Wilmington DE
19886-1020

A. Received by (Please Print Clearly) B. Date of Delivery
SEP 27 2000

C. Signature [Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

[Star]

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Article Number (Copy from service label)
Form 3811, July 1999 7000 0520 0012 2122 9278
Domestic Return Receipt 102595-00-M-0852

COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Melanie Cowdery
over Financial Services
CO 008
New Albany Ohio
43054-3008

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
[Signature] **9801**

C. Signature [Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

[Star]

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Article Number (Copy from service label)
Form 3811, July 1999 7000 0520 0012 2055 7402
Domestic Return Receipt 102595-00-M-0852

1. Article Addressed to:

Discover Bank
PO 15192
Wilmington DE
19886-1020

A. Received by (Please Print Clearly) B. Date of Delivery
NOV 20 2000

C. Signature [Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

[Star]

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label)
PS Form 3811, July 1999 7000 0520 0012 2121 1822
Domestic Return Receipt 102595-99-M-1789

BTPT 4952 5000 0922 E002

SENDER: Do NOT LET them keep

1. Attach this form to the front of the mailpiece, or on the back if space does not permit. "Return Receipt Requested" on the mailpiece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:

Discover / Fraud
PO 30943
Salt Lake City
UTAH 84130

4a. Article Number

7003 2260 0003

4b. Service Type

☐ Certified Mail
☐ Registered
☐ Express Mail

7. Date of Delivery

8. Addressee's Address (Only if requires and fee is paid)

6. Signature: (Addressing Agency)
PS Form 3811, December 1994

PO Box 3008
New Albany, OH 43054-3008

February 15, 2001



Sherry E Becker
820 S 7th Ave
Pasco WA 99301-5722

Account Number	6011-0096-5059-1972
Current Balance	\$2,690.64
Amount Now Due	\$159.00
Amount Enclosed	\$

*Plaintiff's response to this
notice was to re-send by cert mail*

Please detach and mail in enclosed envelope

original 7000 0520 0012 21211822

Date of Last Payment: 09-29-2000
Last Date for Payment: 03-17-2001

*New cert # return - on march 8th 2001
#7000 0520 0012 2055 7402*

Dear Sherry E Becker,

This letter is to notify you that your Discover Platinum Card account owed to Discover Bank is sixty (60) or more days delinquent. Please be advised that you are now in default of your cardmember agreement.

You may cure this default by paying the Amount Now Due on or before Last Date for Payment as referenced above. If this payment is made and your account is not revoked, your account privileges will continue as though you did not default. If you do not make such payment, we will conclude that you have no intention to cooperate with us and we may revoke your account and escalate our efforts to collect this account.

If you are unable to remit this amount it will be necessary for you to contact us immediately. You may contact us between the hours of 8:00 am to midnight Monday thru Friday and 9:00 am to 5:30 pm Saturday EST at the phone number listed below.

Sincerely,

Melanie Cowdery
Discover Financial Services, Inc.
1-800-347-4779

Account Number: 6011-0096-5059-1972



28SN R00014706
5967/15 1476/15

This is an attempt to collect a debt and any information obtained may be used for that purpose.

Discover® Platinum Card issued by Greenwood Trust Company, Member FDIC

010216
025505

P1 of 1

it pays
more
to



PO Box 3330
Olathe KS 66063-3330
ADDRESS SERVICE REQUESTED

Encore
receivable management inc.
Telephone: 888-556-1245

August 1, 2001

ENCORE RECEIVABLE MANAGEMENT INC
PO Box 3330
Olathe KS 66063-3330

1767298-1 108865 4326
Sherry E Becker
820 S 7th Ave
Pasco WA 99301-5722



Creditor: Enhanced Asset Mngmt/Disc Trust-Erc07143
Account #: [REDACTED] 1972
Placement Date: 07/31/01
Balance: \$3029.40

Past Due Balance

Detach Upper Portion And Return With Payment

Creditor: Enhanced Asset Mngmt/Disc Trust-Erc07143
Account #: [REDACTED] 1972
Placement Date: 07/31/01
Balance: \$3029.40

Dear Sherry E Becker:

The above referenced account has been referred to our office for collection of the balance in full. Previous attempts have been made by our client to resolve this debt voluntarily. As of this date, those attempts have been ignored. Therefore, your original agreement with the above mentioned creditor has been revoked.

Encore Receivable Management, Inc. has been authorized by our client to resolve this debt and we are committed to provide the necessary effort to properly collect this debt. We recommend that you take advantage of this opportunity to pay the balance in full to prevent further collection activity.

Please detach the upper portion of this notice and return with your payment in the enclosed envelope.

Note: If payment has already been made, please notify this office at 888-556-1245 to avoid further communications.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose.

IONERMA011

CERTIFIED LEGAL NOTICE NUMBER # 7000 0520 0012 2121 1860

Sherry Becker

820 S. 7th Ave
Pasco Washington 99301
America

FIRST AND LAST NOTICE

August 10, 2001

ENCORE RECEIVABLE MANAGEMENT INC
400 ROGERS ROAD
OLATHE KS 66063

ATTENTION TO WHOM EVER ,

I do not appreciate you or your company trying to send me a **FRAUDULENT DEBT NOTICE**.
I HAVE RETURNED IT WITH THIS NOTICE AND HAVE ALSO INCLUDED SOME OF THE CURRENT REGULATIONS UNDER FEDERAL RESERVE BANKING LAWS THAT YOU AND YOUR CLIENT SHOULD STUDY BEFORE YOU START TRYING TO THREATEN ME WITH A JUDGMENT. AND WHY HAS YOUR CLIENT NOT WRITTEN TO ME REGARDING MY THREE CERTIFIED WRITTEN LETTERS? WHY HAS YOUR CLIENT REFUSED TO ANSWER ANYTHING IN WRITING? IS IT BECAUSE I KNOW THE LEGAL MEANING OF "WITHOUT RECOURSE"? YOUR CLIENT WAS GIVEN THREE OPPORTUNITIES TO RESPOND TO ME CONCERNING THE CONTENTS OF THE LETTERS. AS OF AUGUST 11 2001 YOUR CLIENT HAS YET TO RESPOND IN WRITING . DISCOVER WAS GIVEN 10 DAYS TO RESPOND WHEN I SENT THE FIRST CERTIFIED LEGAL NOTICE REFUTING THE DEBT THEY ARE ATTEMPTING TO COLLECT. THIS WAS WAY BACK IN SEPTEMBER 2000.

I HAVE INCLUDED THE AUGUST 2000 DISCOVER STATEMENT WITH THE CLOSING DATE OF AUGUST 20TH 2000. HOW COULD I OWE DISCOVER ANYTHING IF THERE WAS A BALANCE TRANSFER ? I HAVE THE COPIES AND MADE A SET FOR YOU WHO EVER GETS THIS LETTER HAD BETTER BE ABLE TO SIGN A NAME AND IDENTIFY THEMSELVES. AS I PLAN ON WRITING TO THE BOARD OF GOVERNORS AND REPORTING THIS TO THE OFFICE OF THE COMPTROLLER . AS I WILL NOT BE HARRASSED FOR A ILLEGAL DEBT THAT HAS NO LEGAL MERIT MUCH LESS VALIDITY AND I WOULD LIKE A COPY OF YOUR INSURANCE POLICY AND WHO YOU COMPANY IS BONDED THROUGH BECAUSE I WILL BE FILING MY OWN CLAIM AGAINST THIS COMPANY FOR TRYING TO COLLECT AN DEBT THAT DOES NOT LEGALLY EXIST....

ONE

CERTIFIED LEGAL NOTICE NUMBER # 7000 0520 0012 2121 1860

165 LAWRENCE BELL DR STE 100
PO BOX 9027
WILLIAMSVILLE, NY 14231-9027

FORWARDING SERVICE REQUESTED



MAR 15 2002

28281372

SHERRY E BECKER
820 S 7TH AVE
PASCO WA 99301-5722

A026
EY15
200

NAFS

National Action Financial Services, Inc.

1-716-565-1020 1-800-982-0484
Fax 716-565-1041

Previous Creditor: Discover Bank
Current Creditor: NEW VISION FINANCIAL L.
Account Number: [REDACTED] 1972
Balance: \$3029.40

NATIONAL ACTION FINANCIAL SERVICES
PO BOX 9027
WILLIAMSVILLE, NY 14231-9027

Please check box if above address is incorrect
and indicate change(s) on reverse.

▼ Please detach and return top portion with your payment ▼

Dear Sherry E Becker:

The account listed above has been placed with our agency for collection.

Your account is seriously past due and must be paid in full or we will proceed with appropriate collection activity.

Please remit the entire balance due to our office using the return envelope provided.

If you have any questions or wish to discuss your account with one of our representatives, please call our toll free number at 1-800-982-0484.

This is an attempt to collect a debt and any information obtained will be used for that purpose. This is a communication from a debt collector.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will obtain verification of the debt or obtain a copy of a judgement and mail you a copy of such judgement or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original credit grantor, if different from the current credit grantor.

In conformance with the Federal Fair Credit Reporting Act, following is the notification address which you should write to National Action Financial Services, Inc. at in the event that you dispute as inaccurate specific information reported by National Action Financial Services, Inc. to any credit-reporting agency: National Action Financial Services, Inc., 165 Lawrence Bell Drive, Williamsville, NY 14221.

Sherry Becker

820 S. 7th Ave
Pasco Washington 99301
America

FIRST AND LAST NOTICE

March 21, 2002

NATIONAL ACTION FINANCIAL SERVICES
165 LAWRENCE BELL DR STE 100
WILLIAMSVILLE, NY 14231-9027

ATTENTION TO WHOM EVER ,

I do not appreciate you or your company trying to send me a **FRAUDULENT DEBT NOTICE**.

I HAVE RETURNED IT WITH THIS NOTICE AND HAVE ALSO INCLUDED SOME OF THE CURRENT REGULATIONS UNDER FEDERAL RESERVE BANKING LAWS THAT YOU AND YOUR CLIENT SHOULD STUDY BEFORE YOU START TRYING TO THREATEN ME WITH A JUDGMENT. AND WHY HAS YOUR CLIENT NOT WRITTEN TO ME REGARDING MY THREE CERTIFIED WRITTEN LETTERS? WHY HAS YOUR CLIENT REFUSED TO ANSWER ANYTHING IN WRITING? IS IT BECAUSE I KNOW THE LEGAL MEANING OF "WITHOUT RECOURSE"? YOUR CLIENT WAS GIVEN THREE OPPORTUNITIES TO RESPOND TO ME CONCERNING THE CONTENTS OF THE LETTERS. AS OF AUGUST 11 2001 YOUR CLIENT HAS YET TO RESPOND IN WRITING . DISCOVER WAS GIVEN 10 DAYS TO RESPOND WHEN I SENT THE FIRST CERTIFIED LEGAL NOTICE REFUTING THE DEBT THEY ARE ATTEMPTING TO COLLECT. THIS WAS WAY BACK IN SEPTEMBER 2000.

I HAVE INCLUDED THE AUGUST 2000 DISCOVER STATEMENT WITH THE CLOSING DATE OF AUGUST 20TH 2000. HOW COULD I OWE DISCOVER ANYTHING IF THERE WAS A BALANCE TRANSFER ? I HAVE THE COPIES AND MADE A SET FOR YOU WHO EVER GETS THIS LETTER HAD BETTER BE ABLE TO SIGN A NAME AND IDENTIFY THEMSELVES. AS I PLAN ON WRITING TO THE BOARD OF GOVERNORS AND REPORTING THIS TO THE OFFICE OF THE COMPTROLLER . AS I WILL NOT BE HARRASSED FOR A ILLEGAL DEBT THAT HAS NO LEGAL MERIT MUCH LESS VALIDITY AND I WOULD LIKE A COPY OF YOUR INSURANCE POLICY AND WHO YOU COMPANY IS BONDED THROUGH BECAUSE I WILL BE FILING MY OWN CLAIM AGAINST THIS COMPANY FOR TRYING TO COLLECT AN DEBT THAT DOES NOT LEGALLY EXIST....

ONE

3-28-2002

Attention

NAF S

You and each of YOU/DISCOVER/ENCORE
Are going to recognize that All of YOU
HAVE/ARE TRYING TO FURTHER COMMIT
FRAUD. LOOK AT DISCOVER'S
OWN STATEMENT DATED
AUG 20TH 2000

THIS ALL I NEED IN FEDERAL
COURT TO SUE UNDER RICO.

Don't bother me and you won't
be sued I better get a apology
SOON From DISCOVER/ENCORE/NAF S
OR I will do what is written

**MERICAN
RECOVERY SYSTEMS, INC.**
(800)638-4714

04/08/03

ACCOUNT # : 003580015
ORIGINAL CREDITOR ACCOUNT # : 70000000001972
CREDITOR : RIVER CITY FINANCIAL LLC AS SUCCESSOR IN INTEREST TO DISCOVER BANK
BALANCE : \$ 4092.64

Dear SHERRY E BECKER,

Your delinquent account has been placed with our company for collection. We have been authorized by our client to collect the outstanding amount owed to them.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will, obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor if different from the current creditor.

Sincerely,

Barnes
BARNES

You may now pay using your checking account through our secure internet online payment system 24 hours per day 7 days per week at <http://www.arccollector.com/direct.htm>

This is an attempt to collect a debt. Any information obtained will be used for that purpose.

PLEASE SEE REVERSE SIDE FOR IMPORTANT INFORMATION.

✕ Detach Bottom Portion And Return With Payment ✕

ARS
1699 WALL STREET SUITE 300
MT PROSPECT IL 60056-5788
ADDRESS SERVICE REQUESTED

DAYTIME PHONE :		EVENING PHONE :	
() -	() -	() -	() -

SOCIAL SECURITY :
Creditor:
RIVER CITY FINANCIAL LLC
0009858-LET1

Account # : 003580015
Creditor : RIVER CITY FINANCIAL LLC
Balance : \$ 4092.64

ARS
1699 WALL STREET SUITE 300
MT PROSPECT IL 60056-5788

I do not owe Anything

you & discover are going

mailed response out 4/15/03

to be reported to the FTC & Fed Reg Bar

NOT Owe You

Who are you?

No contract EXISTS between

River city and I

not bother

no again

April 13 2003

Attention ARS / River City / Discover

I want you to understand how
I am tired of getting letters like
yours for a BOGUS claim that
NEVER EXISTED

I want you to look at the
enclosed attachments

VERY CLOSELY

This IS BOGUS HARASSMENT

1. Statement from Discover
2. Safe & Sound Banking practices
Regarding unauthorized Electronic funds transfers
~~2 (m)~~ 2 (m) sect 205.3
- 3. copy of \$2000.00 check made out to
Discover
4. No proof via voice recording authorizing
transfer
5. copy of cert letter to Discover
please Note they never responded

I am going to a Attorney with the same copies you are holding and plan on suing Discover for fraud and harassment. I do NOT have to put up with this 3 yrs of letters like yours. Is plenty time to sue

Sherry Becker



05/08/03

ACCOUNT # : 003580015
 ORIGINAL CREDITOR ACCOUNT # : ██████████ 1972
 CREDITOR : RIVER CITY FINANCIAL LLC AS SUCCESSOR IN INTEREST TO DISCOVER BANK
BALANCE : \$ 4141.94

Dear SHERRY E BECKER,

THIS DEBT MUST BE PAID

The balance owed to my client still remains unpaid. You have not communicated any reason why this debt should not be repaid to my client, nor have you responded to our request for payment.

It is important that you mail the balance today or contact our office with the date the balance will be mailed. This must be done in order to avoid further collection efforts by our company!

Sincerely,

Mr. Rosenberg
 MR. ROSENBERG

You may now pay using your checking account through our secure internet online payment system 24 hours per day 7 days per week at:
<http://www.arcollection.com/direct.htm>

This is an attempt to collect a debt. Any information obtained will be used for that purpose.

PLEASE SEE REVERSE SIDE FOR IMPORTANT INFORMATION.

✕ Detach Bottom Portion And Return With Payment ✕

ARS
 1699 WALL STREET SUITE 300
 MT PROSPECT IL 60056-5788
 ADDRESS SERVICE REQUESTED

DAYTIME PHONE : () -	EVENING PHONE : () -
SOCIAL SECURITY :	- -

Creditor:
 RIVER CITY FINANCIAL LLC
 0010057-LET1

Account # : 003580015
 Creditor : RIVER CITY FINANCIAL LLC
Balance : \$ 4141.94

ARS
 1699 WALL STREET SUITE 300
 MT PROSPECT IL 60056-5788

003580015-0002 19776
 SHERRY E BECKER
 820 S 7TH AVE
 PASCO WA 99301-5722

CERTIFIED 7000 0520 0012 2120 2424

Sherry Becker

820 S 7th Ave.
Pasco Washington 99301
America
Home Phone 509-547-3275

June 30, 2003

ARS ATTENTION MR. ROSENBURG
1699 WALL STREET SUITE 300
MT. PROSPECT IL 60056-5788

Attention MR.ROSENBURG

I am returning your bogus claims for funds NOT OWED to you or any other entity.
I want to again FOR THE LAST TIME state that if you send me anymore "PRIORITY GRAMS"
I will move ahead with my attorney to sue you and DISCOVER for fraud . I Once again have enclosed the
EVIDENCE of the debt being paid and FOR THREE YEARS NOW Discover has repeatedly tried to
continue a fraud upon my name and this will no longer be tolerated.

You had better realize that the documents you are holding are substantial evidence AGAINST DISCOVER.
I have paid the 2000.00 back in September of 2000. the copy of the check your holding is prima facia
AGAINST DISCOVER . The copy of the August 2000 statement you are holding is prima facia evidence
AGAINST DISCOVER . You must be stupid if you think I can not read a credit card statement you had better
LOOK REAL CLOSE how could I owe DISCOVER ANYTHING ESPECIALLY IF THEY TRANSFERRED THE
BALANCE OWING? ARE YOU READING IT ? LOOK AT IT DISCOVER DOUBLED THE AMOUNT I
OWED AND SAID THEY TRANSFERRED IT **EXCUSE ME BUT THAT IS SERIOUS FRAUD.....**

So I think I had better start preparing to send out subpoenas and file the fraud suit in my local Federal
court and then you and DISCOVER will be paying to fly here and pay for a motel room and well it could get quite
expensive....BUT the EVIDENCE IS ON MY SIDE do you have the time to get involved in a serious lawsuit ?
I do .

Sincerely DISGUSTED

Sherry Becker 

CERTIFIED 7000 0520 0012 2120 2424



PRM FINANCIAL SERVICES, Inc.
4015 Beltline Road, Suite 100, Addison, Texas 75001-4383
PO BOX 819092, Dallas, Texas 75381-9092

IT'S TIME TO SUCCEED!

Obtain a new MasterCard® credit card and pay off your old obligation at the same time

See Important Notice Below and Disclosures on Back



SHERRY E BECKER
820 S 7TH AVE
PASCO, WA 99301

Dear SHERRY E BECKER,

PRM is pleased to announce that we have recently acquired your account as identified to the right. The good news is that we're able to give you a unique opportunity to settle that obligation and work toward the financial freedom you deserve.

While we don't know the circumstances resulting in your default on this account, we assume you had every intention of repaying the obligation. PRM can help you find a constructive way to settle this obligation! One way we can help is to offer you the unique opportunity to apply for a MasterCard® credit card issued by 5Star Bank.

How Does the Program Work?

If you agree to participate and are approved, a mutually agreed upon amount of your outstanding obligation will be transferred to a new MasterCard issued by 5Star Bank, with an initial credit limit equal to the amount transferred plus a \$30 annual fee. PRM will then send you a letter releasing you from your original obligation.

As you make monthly payments under your MasterCard credit card agreement, you will have available credit you can use for purchases and cash advances, and 5Star Bank will report the payment history on your new MasterCard account to the credit bureaus. This is your chance to take control of your financial situation.

If you are approved to participate in this program you can:

- Get a discount on your old debt.
- Establish a new unsecured Mastercard credit card account.
- Transfer a mutually agreed to portion of the \$3499.58 you owe to your MasterCard account, and repay it in manageable amounts!
- Enjoy greater spending power as you pay down your principal balance.
- Experience the purchasing power a credit card provides to travel, make online purchases ... and more!

Get Started Today!

There are 3 simple ways to apply:

- Contact us online at www.prmfs.com
- Fill out and return the application on the back side of this letter and return in the postage paid envelope enclosed.
- Call us TOLL FREE at 1-800-965-7511 (*Se Habla Español*)

Before applying, please **review the important notice below and credit card disclosure information on the reverse side.**

If you don't wish to participate in the MasterCard program offered by PRM, call

YOUR ACCOUNT INFORMATION

Original Creditor: DISCOVER

Original Account No: [REDACTED] 1972

Principal Due: \$3029.40

Interest Due: \$470.18

Total Amount Due: \$3499.58

PRM Account No.: 707052

ENJOY THESE BENEFITS OF THE 5STAR MASTERCARD:

- It's an unsecured credit card!
No deposit required!
No application fee!
- Shopping and bill paying convenience.
- The status of worldwide MasterCard® acceptance at over 19 million locations.
- Affordable rates and fees.

Apply:

1



online at
www.prmfs.com

2



by phone at
1-800-965-7511

3



by mail

CERTIFIED # 7003 2260 0005 2564 1818

Sherry Becker
820 S 7th Ave
Pasco Washington 99301
America

August 15, 2004

DISCOVER
PO 30943 SALT LAKE CITY UT 84130 &
PRM FINANCIAL SERVICES INC.
4015 BELTINE RD. STE 100 ADDISON, TEXAS 75001-4383

RE : FRAUDULENT COLLECTIONS AND HARASSMENT
BOGUS # [REDACTED] 1972 NO LONGER EXISTS

ATTENTION DISCOVER AND PRM

I HAVE PUT UP NOW WITH 5 YEARS OF BOGUS HARASSMENT FROM 4 DIFFERENT COLLECTION AGENCIES FOR A ERROR AND FRAUD ON DISCOVERS PART. YOUR/ DISCOVERY'S REFUSAL TO CORRECT SUCH FRAUD HAS CAUSED THIS ENTIRE MATTER TO GO ON FOR 5 YEARS. I HAVE SENT CERTIFIED CORRESPONDENCE AT EACH ATTEMPT. THERE HAS **NEVER BEEN** A VALID RESPONSE BY DISCOVER TO ACKNOWLEDGE ANY OF THIS. DISCOVER JUST CONTINUES TO TRY TO CONTINUE THIS FRAUD AND SELLS A BOGUS ACCOUNT THAT DOES NOT LEGALLY EXIST.

I HAVE AFTER 5 YEARS GROWN TIRED OF THE RIDICULOUS ACTIONS BY THIS DISCOVER FRAUD AND THE TRASHING OF MY CREDIT REPORT. I HAVE FOR DISCOVERS AND PRM'S CONVENIENCE SENT COPIES OF THE EVIDENCE **AGAINST DISCOVER**. I WANT TO AT THIS TIME EXPLAIN I FULLY UNDERSTAND CERTAIN BANKING LAWS **AND RULES** ESPECIALLY EFT FUND TRANSFERS THAT **DO NOT EXIST**.

I ALSO WANT DISCOVER AND PRM TO UNDERSTAND THAT I KNOW WHAT A BALANCE TRANSFER MEANS AND WHEN YOU HAVE A TRANSFER MADE FROM AN ACCOUNT THERE COULD NEVER BE **A BALANCE OWING**... NOW PLEASE LOOK AT THE ENCLOSED COPIES AS THEY ARE THE EVIDENCE OF A FRAUD THAT DISCOVER HAS BEEN REPEATEDLY CONDUCTING AGAINST ME FOR **5 YEARS**. I HAVE NEVER IN MY LIFE SEEN A FRAUD AS OBVIOUS AS THIS IS AND I BET A JURY WILL BE PRETTY SURPRISED TOO.

WHEN I FINISH THE LEGAL FILING I WILL BE SENDING YOU THE COMPLAINTS

WITHOUT RECOURSE OF COURSE
Sherry Becker

1. COPY OF ORIGINAL STATEMENT 2. COPY OF CASHIERS CHECK FOR \$2000.00

PS LEGALLY SINCE A BALANCE TRANSFER OCCURRED I NEVER SHOULD HAVE SENT THE \$2000.00 SO DISCOVER OWES ME.

ONE

CERTIFIED # 7003 2260 0005 2564 1818

CONSUMER COMPLAINT FORM

GENERAL COMPLAINT

OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

AG FORM #208 3/8/02

STATEWIDE TOLL FREE 1 800-551-4636

CONSUMER INFORMATION

Name Sherry Becker Sherne E
Please Print or Type Last First Middle Initial
 Address: 820 S 7th Ave
 City: Pasco State WA Zip 99301
 Phone: Day: () 547-3275 Evening: () 582-2263 E-mail address: _____

In order to process your complaint, the Attorney General's Office will send a copy of your complaint to the complained of business.
 Do you want the Attorney General's Office to send this business a copy of your complaint? ☒ Yes ☐ No

I understand that if I answer No, the Attorney General's Office will not process this complaint. Additionally, if I answer Yes, I understand that my complaint and any related documents I have submitted will become "public record." Under state law, public records are subject to public records disclosure requests. Under some circumstances, my complaint and related documents may therefore be seen by other people.

BUSINESS INFORMATION

Name of business that I am complaining about Discover card / PRM Financial
Please Print or Type
 Address: PO 30943
 City: Salt Lake City State: Utah Zip: 84130
 Phone: () _____ Fax: () _____ Toll-free number _____ E-mail address _____
 Name of Owner or Manager (if known): _____
 Names and addresses of any other businesses involved in your complaint: PRM Financial
4015 Beltline Rd Ste 100 Addison Texas 75001-4383
 Item or service purchased: Fraudulent balance Transfer made without knowledge
 Cost of item or service: Did you sign a contract? No Date of transaction: 7/29/2000
 Salesperson's name: _____
 Was an advertisement involved? Date and source of advertisement: _____
 (Please send a copy of the advertisement if it is available.)

ABOUT YOUR COMPLAINT

Have you complained to the business? ☒ If YES, to whom: (and their position) mailed certified letters
 What response did you receive?
None
 If you have not contacted the business, explain why not: _____
 Have you filed a complaint about this business with the Attorney General's Office before? NO
 If Yes, list the file number assigned to that complaint: _____
 Have you contacted a private attorney? If YES, identify the name and address of the attorney:
Not yet
 Is there a court or other legal proceeding pending? If YES, please explain:
will be pursuing possibilities

EXPLAIN YOUR COMPLAINT IN DETAIL (Use additional pages if necessary):

I had called to inquire about rates and when my interest would be changing. I decided to not change anything. I was told by the Discover associate that they could not transfer to another card. I had given personal information to agent then told could not do any balance transfers. The call ended. ~~It~~ a couple of weeks later I called my other card to inquire balance transfer rates. I was informed that a deposit had been made. I was very shocked. So I did nothing. I got the August statement from Discover and was very shocked And angry by what had taken place. Somehow Discover moved the remaining balance and added it at the same time to make the amount owing close to \$5000.00. I phoned right in front of my parents and to this day after various times & various collection agencies have yet to get Discover to correct their Fraud against me. They have ~~prof~~ profited from this to the tune of \$12,000 and I legally never had to send anything to them yet they made a lot of money from their error.

What do you think the business should do to resolve your complaint? (Circle one)
☒ Refund ☐ Deliver Product ☐ Perform Service

Other Explain if you have circled "Other":

a lot of money from their error.

PLEASE TYPE OR PRINT This form should be returned to the address nearest to you. After your complaint is received, you will be contacted by mail regarding assignment of your complaint.

Seattle: North King, Snohomish, Clallam and Jefferson Counties and Bainbridge Island
 900 FOURTH AVENUE, SUITE 2000
 SEATTLE, WA 98164-1012
 (206) 464-6684 fax (206) 464-6451

Vancouver: Southwestern Washington
 1220 MAIN STREET, SUITE 549
 VANCOUVER WA 98660-2964
 (360) 759-2150 fax (360) 759-2159

Bellingham: Island, San Juan, Skagit and Whatcom Counties
 103 E. HOLLY, SUITE 308
 BELLINGHAM, WA 98225-4728
 (360) 738-6185 fax (360) 738-6190

Tacoma: Pierce, Mason, Grays Harbor, Kitsap and south King County
 1019 PACIFIC AVENUE S, 3rd FL
 TACOMA WA 98402-4411
 (253) 593-2904 fax (253) 593-2449

Please include copies of related documents.
SEND COPIES ONLY—DO NOT INCLUDE ORIGINAL DOCUMENTS!

Spokane: Eastern Washington
 1116 WEST RIVERSIDE
 SPOKANE WA 99201-1194
 (509) 456-3123 fax (509) 458-3548

Kennewick: Central Washington
 500 N MORAIN ST, SUITE 1250
 KENNEWICK WA 99336-2607
 (509) 734-7140 fax (509) 734-7290

SIGNATURE

I declare, under penalty of perjury under the laws of the State of Washington, that the information contained in this complaint is true and accurate, and that any documents attached are true and accurate copies of the originals.

Signature

Declared this date

City and State where signed



Christine O. Gregoire

ATTORNEY GENERAL OF WASHINGTON

500 N Morain Suite 1250 • Kennewick WA 99336-2607

September 14, 2004

SHERRY BECKER
820 S 7TH AVE
PASCO, WA 99301


Re: DISCOVER CARD AND PRM FINANCIAL SERVICES

File #KEN -220901

Dear Sherry Becker:

Our office has received a reply from PRM Financial Services regarding your complaint. Enclosed is a copy of that reply for your records.

When we have a response from Discover Card, we will contact you again.


Marilyn Anderson
Complaint Analyst
Consumer Protection Division
(509) 734-7140

Enclosure



PRM FINANCIAL SERVICES, INC.

4015 Beltline Road, Suite 100, Addison, Texas 75001-4383 - P. O. Box 819092, Dallas, Texas 75381-9092
(800)375-3591 Local (972) 387-8995 Telefax (972) 404-8519

September 9, 2004

Attorney General Of Washington
Attn: Marilyn Anderson
500 N. Morain, Suite 1250
Kennewick, WA 99336-2607

RECEIVED

SEP 13 2004

ATTORNEY GENERAL
KENNEWICK OFFICE

Your File No: KEN - 220901
Our File No: 707052
Consumer: Sherry E. Becker

Dear Marilyn Anderson,

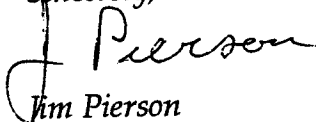
I am writing you in response to your letter of September 1, 2004 as it relates to the above mentioned consumer file.

PRM Financial Services, Inc. purchases or handles placement charge-off debt in bulk. In most cases debt that is purchased or placed with us we receive or can request file documentation to support the debt as valid.

In reviewing Ms. Becker's statements of concern and other documentation you included in your letter we have already retired her account and we are considering this matter closed.

We apologize for any inconvenience this may have caused and if I can be of further assistance please do not hesitate to contact me.

Sincerely,



Jim Pierson
Vice President / Operations

This communication is from a debt collector attempting to collect a debt. Any information obtained will be used for that purpose.



October 12, 2004

Sherry E. Becker
820 S 7th Avenue
Pasco, WA 99301-5722

Dear Ms. Becker:

I appreciate your patience while allowing me to investigate your Discover® Card Account regarding your balance transfer dispute.

When you contacted our Cardmember Service Division on July 25, 2000, a balance transfer was processed to pay your MBNA account for \$2,488.34.

Where is Discover's proof I agreed?

When you agreed to the balance transfer offer and gave the appropriate information to pay your MBNA account, a legal disclosure was read to you as follows:

"Upon approval, we will issue payment to your creditor. Changes or stop requests cannot be accepted once processing begins. If the transaction is more than your available Account credit limit, we will automatically lower the amount to your available credit and complete the transfer. Balance Transfers are processed from the lowest to highest dollar amount.

Most Balance Transfers are processed within two weeks; however, please continue to make payment to those accounts to avoid late fees and finance charges.

Balance Transfers do not earn a Cashback® Bonus Award.

The special Balance Transfer Rate of 3.9% will expire with your January 2001 statement, and then the APR (Annual Percentage Rate) for purchases applies. However, if you are late making a payment or if your Account is overlimit, the special Balance Transfer Rate will terminate and the standard APR for purchases or the applicable Default Rate will apply as described in the Default Rate Plan section of the Cardmember Agreement.

DISCOVER
FINANCIAL SERVICES

Additional balance transfers may be requested. There is no grace period on balance transfers. We apply payments to balances with low special/introductory APRs, such as special balance transfer and purchase APRs, prior to balances with standard APRs. Your savings under this offer will be reduced if you have existing balances or make additional transactions that are subject to standard APRs.

The APRs and Fees disclosed are those in effect at this time and may be modified by other promotional rate offers or changes to your Account terms."

When you called on August 27, 2000 to inform us that you did not authorize the balance transfer, we advised you that we were not able to stop the balance transfer. You stated that the money was applied to your MBNA account and you would be contacting them to request a check and you would send the funds to us once received.

We spoke to MBNA who has confirmed that a credit balance refund check was sent to you on August 27, 2000 for \$2,311.27.

She leaves a lot of questions to be answered

Our records indicate that you have received credits for your finance charges totaling \$13.77, as a gesture of good will. However, further courtesy adjustments will not be given as we feel you were properly notified of our terms and conditions.

Should you have further questions or concerns, please contact me directly at (302) 328-3300, ext. 16286, weekdays from 9:00 a.m. to 6:00 p.m., EST.

Phone number

Sincerely,

Pam Martin
Pam Martin

Executive Offices

Discover Financial Services, Inc.

is bogus

Thred to call

CC: Attorney General

Discover/Genesis

PLAZA Associates
Mitchell N KAY

51959306-10 \$3,029.40
28 50 00007008 A 271303
51959306 7513050-3090006FSAS1

Temp-Return Service Requested

Amount Enclosed Settlement Amount

\$1,514.70

Call Toll Free: 1-888-752-0332
(619) 342-8592

www.plazaassociates.net

SHERRY E BECKER
200802 E GAME FARM RD SPC 70
KENNEWICK WA 99337-6856

Address

Home #

Work #

GENESIS FINANCIAL SOLUTIONS ASSIGNEE OF DISCOVER CARD

Please return top portion with payment. See reverse side for return address.

Plaza Associates

RE ▶ SHERRY BECKER

Date ▶ May 13, 2005

Creditor ▶ GENESIS FINANCIAL SOLUTIONS
ASSIGNEE OF DISCOVER CARD

Account Number ▶ [REDACTED] 31972

Balance Due ▶ \$3,029.40

Control Number ▶ 51959306-10

Settlement Amount \$1,514.70

2005 Notice
Discover/Kay

A SETTLEMENT OFFER

Please be advised that we are a professional collection agency.

We have been authorized to offer you the opportunity to settle this account with a lump sum payment for of the above balance due, which is equal to \$1,514.70.

This offer will be valid for a period of thirty-five (35) days from the date of this letter.

If you have any questions regarding this offer, please contact this office at the number(s) provided above.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the or any portion thereof, this office will assume this debt is valid.

If you notify this office in writing within 30 days from receiving this notice, this office will: Obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification.

If you request this office in writing within 30 days after receiving this notice, this office will provide you the name and address of the original creditor, if different from the current creditor.

You may already have satisfactory proof that this account is listed with us in error. If so, please send the notice back along with a copy of one of the following to support your claim:

Bankruptcy Notice from the court stating case number and filing date, Satisfaction of Judgment, Proof of settlement, Letter from the original Creditor clearing your account.

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained or used for that purpose.

If you would like to make a payment, or if you have any questions regarding this account, you can contact our office at the telephone number provided above; or by writing us at the address provided below; or by logging on our website at:

www.plazaassociates.net

On our website you will be able to negotiate and arrange payment of this account, view and update information regarding this account, or obtain information on other ways to contact our office.

PLEASE ADDRESS ALL PAYMENTS TO:

Plaza Associates
JAF Station, PO Box 2769
New York, NY 10116-2769

23

PO Box 18008
Hauppauge, NY 11788-8808
42 65 00011820 A 277432
51959306100627050.30900006FSAH3

Temp-Return Service Requested

6/27/05



Control Number	Balance
51959306-10	\$3,029.40
Call Toll Free: 1-888-752-0328 (619) 342-8592	Amount Enclosed

www.plazaassociates.net

SHERRY E BECKER
200802 E GAME FARM RD SPC 70
KENNEWICK WA 99337-6856

Address _____
Home # _____
Work # _____

519593061006270550000003029403P

GENESIS FINANCIAL SOLUTIONS ASSIGNEE OF DISCOVER CARD

Please return top portion with payment. See reverse side for return address.

Plaza Associates

RE ► SHERRY BECKER

Date ► June 27, 2005

Creditor ► GENESIS FINANCIAL SOLUTIONS
ASSIGNEE OF DISCOVER CARD

Account Number ► [REDACTED] 1972

Balance ► \$3,029.40

Control Number ► 51959306-10

This office has written to you previously in an effort to try and resolve your account referenced above. Your balance of \$3,029.40 still remains due and owing.

At this time, resolution of this account can be accomplished in the following manner:

- ☛ Down payment: Forward \$757.35 (25% of the balance due) as an initial down payment to this office in the envelope enclosed.
- ☛ Monthly payments: Forward \$227.20 per month to this office until this account is paid in full.

If you would like to make a payment, or if you have any questions regarding this account, you can contact this office at the telephone number provided above; or by writing us at the address provided below; or by logging on to our website at:

www.plazaassociates.net

On our website you will be able to negotiate and arrange payment of this account, view and update information regarding this account, or obtain information on other ways to contact our office.

Notice: Please see reverse side for important information.

PLEASE ADDRESS ALL PAYMENTS TO:

Plaza Associates
JAF Station, PO Box 2769
New York, NY 10116-2769

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led 05

August 8, 2005

SHERRY E BECKER
200802 E GAME FARM RD SPC 70
KENNEWICK WA 99337-6856

Reference Number - 51959306-10

Account Number ▶ [REDACTED] 1972-A	RE ▶ SHERRY BECKER
Balance Due ▶ \$3,029.40	
Creditor ▶ GENESIS FINANCIAL SOLUTIONS ASSIGNEE OF DISCOVER CARD	

Please be advised that your account, as referenced above, is being handled by this office.

Request is hereby made for payment of the balance due.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid.

If you notify this office in writing within 30 days from receiving this notice, this office will: Obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification.

If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

You may already have satisfactory proof that this account is listed with us in error. If so, please send this notice back along with a copy of one of the following to support your claim:

- Bankruptcy Notice from the court stating case number and filing date, Satisfaction of Judgment, Proof of prior settlement, Letter from the original Creditor clearing your account.

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose.

At this point in time, no attorney with this firm has personally reviewed the particular circumstances of your account.

PLEASE ADDRESS ALL PAYMENTS TO:
Law Offices of Mitchell N. Kay, P.C.
7 Penn Plaza, New York, NY 10001-3995

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✶ Detach Here ✶ Please return bottom portion with payment. ✶ Detach Here ✶

Make Sure to Print Name, Address & Phone Numbers Below

Name	
Street	
City	State Zip
Home Phone ()	Work Phone ()

☐ Please check here if your address has Changed. Make Changes in section above.

SHERRY E BECKER

GENESIS FINANCIAL SOLUTIONS ASSIGNEE OF DISCOVER CARD

Reference Number	51959306-10
Balance Due	\$3,029.40
Amount Enclosed	

▼ Make Check Payable To ▼

Law Offices of Mitchell N. Kay, P.C.
7 Penn Plaza
New York, NY 10001-3995

8/8/05

[illegible]

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MZ1.V6
282705